IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE

STATE OF TENNESSEE, ET AL.)
Plaintiffs,) Case No. 3:24-cv-00033-DCLC-DCP
v.))
NATIONAL COLLEGIATE ATHLETIC))
ASSOCIATION,	,)
Defendant.))

JOINT STIPULATION REQUESTING EXTENSION OF TIME TO RESPOND TO THE AMENDED COMPLAINT AND [PROPOSED ORDER]

WHEREAS, Plaintiffs the State of Tennessee and the Commonwealth of Virginia filed a Complaint and Motion for Temporary Restraining Order and Preliminary Injunction in this action on January 31, 2024;

WHEREAS, this Court denied the temporary restraining order on February 6, 2024;

WHEREAS, this Court held a preliminary injunction hearing on February 13, 2024;

WHEREAS, this Court granted the preliminary injunction on February 23, 2024;

WHEREAS, the parties jointly stipulated to request an extension of the deadline for Defendant, the National Collegiate Athletic Association, to respond to the Complaint by May 1, 2024;

WHEREAS, the Court granted the parties' joint request for an extension on March 26, 2024; and

WHEREAS, the parties jointly stipulated to a request to establish deadlines for Plaintiffs to amend their Complaint pursuant to Rule 15 of the Federal Rules of Civil Procedure by May 1, 2024, and for Defendant to respond to the Amended Complaint by July 1, 2024; and

WHEREAS, the Court granted the parties' joint request to set certain deadlines;

WHEREAS, Plaintiffs filed an Amended Complaint on May 1, 2024, that included the addition of Plaintiffs the State of Florida, the State of New York, and the District of Columbia; and

WHEREAS, the parties continue to meet and confer in the interim.

NOW, THEREFORE, in the interest of efficiency and pursuant to Local Rule 12.1, the parties hereby jointly stipulate and agree that Defendant shall respond to the Amended Complaint by August 30, 2024, and request that the Court enter an order amending that deadline accordingly.

Respectfully submitted,

By: /s/ Cameron T. Norris

Dated: June 28, 2024

Cameron T. Norris Thomas R. McCarthy David L. Rosenthal

CONSOVOY MCCARTHY PLLC

1600 Wilson Blvd., Suite 700 Arlington, VA 22201 (703) 243-9423 cam@consovoymccarthy.com tom@consovoymccarthy.com david@consovoymccarthy.com

Adam K. Mortara LAWFAIR LLC

40 Burton Hills Blvd., Suite 200 Nashville, TN 37215 (773) 750-7154 mortara@lawfairllc.com

Patrick Strawbridge

CONSOVOY MCCARTHY PLLC

Ten Post Office Square 8th Floor South PMB #706 Boston, Massachusetts 02109 (617) 227-0548 patrick@consovoymccarthy.com

Counsel for Plaintiffs

Jonathan Skrmetti Attorney General of Tennessee

Lacey E. Mase
Chief Deputy Attorney General
J. David McDowell
Deputy, Consumer Protection Division
Ethan Bowers
Senior Assistant Attorney General
Tyler T. Corcoran
Marilyn Guirguis
Assistant Attorneys General

Office of the Attorney General and Reporter

P.O. Box 20207

By: /s/ Rakesh N. Kilaru

Rakesh N. Kilaru (*Pro Hac Vice*) WILKINSON STEKLOFF LLP 2001 M Street, NW, 10th Floor Washington, DC 20036 (202) 847-4000 rkilaru@wilkinsonstekloff.com

Robert E. Boston (Tenn. BPR # 009744)
Taylor J. Askew (Tenn. BPR # 033193)
(Pro Hac Vice)
David J. Zeitlin (Tenn. BPR # 037664) (Pro Hac Vice)

HOLLAND & KNIGHT LLP

511 Union Street, Suite 2700 Nashville, TN 37219 Telephone: (615) 244-6380 bob.boston@hklaw.com taylor.askew@hklaw.com david.zeitlin@hklaw.com

Attorneys for Defendant National Collegiate Athletic Association

Nashville, TN 37202 (615) 741-8722 Ethan.Bowers@ag.tn.gov Tyler.Corcoran@ag.tn.gov

Counsel for Plaintiff State of Tennessee

Jason S. Miyares Attorney General of Virginia

Steven G. Popps
Deputy Attorney General, Civil Division
Tyler T. Henry
Assistant Attorney General & Manager,
Antitrust Unit
Jonathan M. Harrison II
Assistant Attorney General, Consumer
Protection

Office of the Attorney General

202 North 9th Street Richmond, Virginia 23219 (804) 692-0485 THenry@oag.state.va.us JHarrison@oag.state.va.us

Counsel for Plaintiff Commonwealth of Virginia

Ashley Moody Attorney General of Florida

/s/ Lizabeth A. Brady
Lizabeth A. Brady
Director, Antitrust Division
Genevieve Hall
Special Counsel
Colin G. Fraser

Assistant Attorney General

Office of the Attorney General, Antitrust Division

PL-01 The Capitol Tallahassee, Florida 32399-1050 850-414-3300 liz.brady@myfloridalegal.com genevieve.hall@myfloridalegal.com colin.fraser@myfloridalegal.com

Attorneys for Plaintiff State of Florida

Letitia James Attorney General of New York

/s/ Elinor R. Hoffmann Elinor R. Hoffmann Chief, Antitrust Bureau Amy McFarlane Deputy Chief, Antitrust Bureau Bryan Bloom Senior Enforcement Counsel, Antitrust Bureau

New York State Office of the Attorney General

28 Liberty Street New York, Ny 10005 elinor.hoffmann@ag.ny.gov amy.mcfarlane@ag.ny.gov bryan.bloom@ag.ny.gov

Attorneys For Plaintiff State of New York

Brian L. Schwalb Attorney General for the District of Columbia

/s/ Seth Rosenthal

Seth Rosenthal Chief Deputy Attorney General

/s/ Adam Gitlin

Adam Gitlin** Chief, Antitrust and Nonprofit Enforcement Section

Office of the Attorney General for the **District of Columbia**

400 6th Street NW Washington, D.C. 20001 202-727-3400 seth.rosenthal@dc.gov adam.gitlin@dc.gov cole.niggeman@dc.gov

Counsel For Plaintiff the District of Columbia

CERTIFICATE OF CONSENT

In accordance with Rule 6 of the ECF Rules & Procedures for the Eastern District of Tennessee, I hereby certify that I have obtained consent for this electronic filing from the signatories listed above.

Dated: June 28, 2024 Respectfully submitted,

By: /s/ Rakesh N. Kilaru

Rakesh N. Kilaru WILKINSON STEKLOFF LLP 2001 M Street NW, 10th Floor Washington, DC 20036 Telephone: (202) 847-4000 Facsimile: (202) 847-4005 rkilaru@wilkinsonstekloff.com

Attorney for Defendant National Collegiate Athletic Association